

III. REMARKS

Claims 1, 2, 4-6, 8-15, 18-22 and 24 are pending in this application. By this amendment, claim 13 has been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 13-15 and 18-20 have been rejected under 35 U.S.C. §101. By this amendment, claim 13 has been amended to include at least one computing device, thus obviating the possibility that the security control apparatus could be functional descriptive material. In view of the foregoing, Applicants request withdrawal of the §101 rejection.

In the Office Action, claims 1, 2, 4-6, 8-15, 18-22 and 24 are rejected under 35 U.S.C. §103(a) as allegedly being anticipated by Reshef *et al.* (U.S. Patent No. 6,584,569), hereafter “Reshef,” in view of Steele *et al.* (US Pub. No. 2003/0191737) (hereafter Steel) and further in view of Wagner (U.S. Patent No. 6,085,224), hereafter “Wagner.”

Applicants assert that the references cited by the Office do not teach or suggest each and every feature of the claimed invention. For example, with respect to independent claims 1, 5 and 13, Applicants submit that the Office is misinterpreting the cited references. In particular, the cited references fail to teach or suggest “receiving an identification of an execution program set to be used to process said message received; [and] retrieving an identification of all message types associated with said execution program set.” Claim 1, similarly claimed in claims 5 and 13. The execution program set is a set of programs used to process the message, i.e., if it were

passed to the server to process the execution page. The message types are expected formats of a messages used with the program set. Based on this information, the claimed invention examines the “message received by said server in relation to said message types associated with said execution program set; and determine[es] if said message received by said server contains an unauthorized element.” In other words, a program set that is to be used to process the message is received and the types of messages expected to be used with that program set are retrieved and an examination determines whether the message includes an unauthorized element based on that information, e.g., the message type (text, etc.) does not match the expected message type.

Reshef discloses a system that generates mutations to mimic potential security vulnerabilities. The Office cites to col. 10, table 1, lines 26-61 and col. 9, lines 32-58 to disclose the above elements. However, a careful review of those sections reveals that Reshef describes a number of mutation rules to be implemented based on the potential security vulnerability. The mutation rules are used to generate mutated requests or exploits for use in an attack stage to test the vulnerability of the system. These mutations are listed in the table. Reshef does not disclose “receiving an identification of an execution program set to be used to process said message received; [and] retrieving an identification of all message types associated with said execution program set.” There is no program set identified that would be used to process the message, only mutation rules used to generate mutated requests or exploits (AttackList) to test security vulnerabilities. Neither Steele nor Wagner overcomes this deficiency. Wagner scans for trigger events defined by event configuration data and generates a response having event indicators, but provides no details of how the trigger events are identified. Col. 16, lines 54-55. In view of the foregoing, Applicants request withdrawal of the rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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